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BY HAND AND EMAIL

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October 18, 2013

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Honorable James M. Peck, U.S.B.J
United States Bankruptcy Court
for the Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

Re: *In re Lehman Brothers Holdings Inc.*, Case No. 08-13555 (JMP):
Response to Claimants' Request for Chambers Conference Regarding
Claims Related to Restricted Stock Units and Contingent Stock Awards

Dear Judge Peck:

We write on behalf of Lehman Brothers Holdings Inc. ("LBHI") to respond to Richard Schager's letter to the Court dated October 9, 2013.

As referenced in Mr. Schager's October 9 correspondence, the parties are currently negotiating a proposed Evidentiary Hearing Procedures Order in the above-referenced matter (the "Proposed Order"). LBHI is hopeful that the parties can reach agreement on the Proposed Order in a form that is satisfactory to this Court. Nonetheless, LBHI does not oppose Mr. Schager's request for a chambers conference after October 25, 2013 to work out the details of the Proposed Order. We are available for such a conference on the following dates: October 29, October 31 or November 1.

Mr. Schager suggests a number of subjects to be discussed at the proposed chambers conference, which LBHI is happy to address at the conference. LBHI disagrees, however, with Mr. Schager's proposal that an evidentiary hearing on the pending Motions to Reclassify should be bifurcated into parts for claimants represented by counsel and claimants proceeding *pro se*. It is LBHI's position that the nature of all of these claims, and the legal issues that relate to the Motions, are identical for all claimants, and the Motions should be dealt with in one evidentiary proceeding.

Thank you for your consideration.

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Respectfully submitted,

/s/ Ralph I. Miller

Ralph I. Miller

cc: All Participants (by email)